

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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| IN RE: LEHMAN BROTHERS HOLDINGS INC., et al., <i>Debtors.</i> | CHAPTER 11 CASE NO. 08-13555 (SCC) |
| MOORE MACRO FUND, LP, MOORE MACRO MARKETS FUND (MASTER), LP, SJL MOORE, LTD., JR MOORE, LP, LM MOORE LP, MF MOORE LP (formerly MOORE GLOBAL FIXED INCOME FUND (MASTER) LP), MOORE GLOBAL INVESTMENTS, LTD., MOORE EMERGING MARKETS FUND (MASTER) LP, MOORE CAPITAL ADVISORS, L.L.C., and TRADE PROCESS CORPORATION, <i>Plaintiffs,</i> <i>-against-</i> LEHMAN BROTHERS HOLDINGS INC., LEHMAN BROTHERS SPECIAL FINANCING INC., and LEHMAN BROTHERS COMMERCIAL CORPORATION, <i>Defendants.</i> | ADVERSARY PROCEEDING NO: 14-02021 (SCC) DECLARATION OF ERIK S. GROOTHUIS IN SUPPORT OF MOTION TO COMPEL |

ERIK S. GROOTHUIS declares as follows, pursuant to 28 U.S.C. § 1746:

1. I am a member of Schlam Stone & Dolan LLP, co-counsel with Teigland-Hunt LLP, for Plaintiffs Moore Macro Fund, LP, Moore Macro Markets Fund (Master), LP, SJL Moore, Ltd., JR Moore, LP, LM Moore LP, MF Moore LP (formerly Moore Global Fixed Income Fund (Master) LP), Moore Global Investments, Ltd., Moore Emerging Markets Fund (Master) LP, Moore Capital Advisors, L.L.C., and Trade Process Corporation (collectively, “Plaintiffs”), and am familiar with the facts of this case. I submit this declaration in support of Plaintiffs’ motion pursuant to Fed. R. Civ. P. 37(a), made applicable to this proceeding by Bankruptcy Rule 7037, to compel Defendants Lehman Brothers Holdings, Inc. (“LBHI”),

Lehman Brothers Special Financing Inc. (“LBSF”), and Lehman Brothers Commercial Corporation (“LBCC”) (collectively, LBHI, LBSF and LBCC are referred to as “Lehman”) to produce documents responsive to the Moore Entities’ First Request for Production of Documents, Items No. 4 and No. 5, and to the Moore Entities’ Second Request for Production of Documents, Item No. 1.

2. Unless otherwise specified, the matters stated herein are based upon my personal knowledge, as well as review of my files.

3. Attached hereto as Exhibit 1 is a true and copy of Plaintiffs’ First Request For Production of Documents, dated August 6, 2014.

4. Attached hereto as Exhibit 2 is a true and correct copy of Defendants’ Responses and Objections to Plaintiffs’ First Request for Production of Documents, dated September 5, 2014.

5. Attached hereto as Exhibit 3 is a true and correct copy of Plaintiffs’ Second Request For Production of Documents, dated November 26, 2014.

6. Attached hereto as Exhibit 4 is a true and correct copy of Defendants’ Responses and Objections to Plaintiffs’ Second Request for Production of Documents, dated December 24, 2014.

7. Attached hereto as Exhibit 5 is a true and correct copy of a February 21, 2014, Letter from Andrew Rossman to Hon. Shelley C. Chapman.

8. Attached hereto as Exhibit 6 is a true and correct copy of the entries from Lehman Privilege Log Nos. 1 and 2 cited in the accompanying memorandum of law.

9. Attached hereto as Exhibit 7 is a true and correct copy of a March 30, 2015, letter from Tracy Schaffer to me.

10. Attached hereto as Exhibit 8 is a true and correct copy of a February 10, 2015, letter from me to Tracy Schaffer.

11. Attached hereto as Exhibit 9 is a true and correct copy of a December 15, 2014, letter from Tracy Schaffer to me.

12. The parties have met in good faith in an attempt to resolve the issues presented in this motion without court action, but were not able to reach agreement. Specifically, in addition the correspondence attached hereto, the parties met in person following an oral argument before this Court on January 16, 2015, which followed an exchange of letters between the parties and the court on discovery issues earlier in January 2015, and also met by phone on October 28, 2014, December 3, 2014, March 5, 2015, and May 20, 2015.

Dated: New York, New York
May 26, 2015

/s/
ERIK GROOTHUIS